

EXHIBIT 4

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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*
RICHARD E. KAPLAN, *
*
Plaintiff *
*
- vs. - * Civil Action No. 04-10402-NMG
* Civil Action No. 05-10320-NMG
*
FIRST HARTFORD CORPORATION, *
*
Defendant *
* * * * * * * * * * * * * * * * *

DEPOSITION of NEIL H. ELLIS, a witness called by and on
behalf of the Plaintiff, pursuant to the Federal Rules of Civil
Procedure, before Charles E. Janey, Jr., CVR and Notary Public
in and for the Commonwealth of Massachusetts, at the offices of
Choate, Hall & Stewart, Two International Place, Boston,
Massachusetts, on Tuesday, May 2, 2006, commencing at 1:55 p.m.

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APPEARANCES:

Mr. Larry C. Kenna, Attorney at Law, and Robert
Rothberg, Attorney at Law, law offices of CHOATE, HALL &
STEWART LLP, Two International Place, Boston,
Massachusetts, 02110, (617) 248-5000; on behalf of the
Plaintiff.

Mr. John B. Nolan, Attorney at Law, law offices of
DAY, BERRY & HOWARD LLP, City Place, Hartford,
Page 1

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9 MR. NOLAN: In the past, right?

10 THE WITNESS: Yes.

11 MR. KENNA: Let's find out when it was.

12 MR. NOLAN: Do you have a good faith
13 basis for this question fitting in with the --

14 MR. KENNA: I think I do.

15 MR. NOLAN: How do you know what I'm
16 going to say?

17 MR. KENNA: Because I know what you're
18 going to say because you --

19 MR. NOLAN: What am I going to say?

20 MR. KENNA: I think you're going to say
21 that we're only limited to asking questions about
22 the last meeting or something like that.

23 MR. NOLAN: I was going to say whether
24 your question fits in with the limits that were put

JANEY ASSOCIATES

□

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1 on you by the judge.

2 MR. KENNA: What limits? There haven't
3 been any limits established. I don't think there
4 are.

5 MR. NOLAN: On new allegations that
6 were not covered by any of the prior cases.

7 MR. KENNA: Our complaint in this case
8 specifically has different and new allegations